

From: [Baris, Reuben](#)
To: [Benbow, Gene](#)
Subject: RE: bromadiolone (Brigand)
Date: Tuesday, August 27, 2013 9:00:53 PM

Hi Gene,
Thanks for your interpretation.
reuben

From: Benbow, Gene
Sent: Tuesday, August 27, 2013 7:23 AM
To: Baris, Reuben
Subject: RE: bromadiolone (Brigand)

Hi Reuben – sorry, I just returned to the office this morning and hadn’t seen your email yet. I looked at the label and to me it looks like this would be an acceptable application. Somehow I doubt that we figured that someone would apply a rodenticide to a “moving” man-made structure, but you can certainly apply the product to other similar “man-made structures” like ships and aircraft, and I don’t see anything which would prohibit a dump truck (and I don’t think we or the states could make the case that a dump truck isn’t a “transport” vehicle).

I could possibly see problems if the bait station were not secure while the truck is going down the road and this could conflict with the label use directions, but so long as the station/bait are not made available to kids/wildlife, it seems okay to me.

I’d ask Bill Jacobs though – he might have experience with this kind of weird application ;).

Thanks,

Gene Benbow
Biologist, EPA
Insecticides-Rodenticides Branch
Registration Division
<http://epa.gov/pesticides/>

From: Baris, Reuben
Sent: Thursday, August 22, 2013 9:22 AM
To: Benbow, Gene
Subject: bromadiolone (Brigand)

Hi Gene,
Question about using this product in a tamper resistant bait station, specifically on the underside of a garbage truck during transport: can the bait stations be left on the truck while it is out on “transport?”

The product is Brigand WB wax block rodenticide (reg no. 87235-2).

I looked at the label and there is nothing preventing use on the trucks, except that it is only to be used "in and within" 100 ft of man-made structures. Can you look at the label and send me your interpretation?

Thanks.
reuben

REUBEN BARIS | ENVIRONMENTAL SCIENTIST | *U.S. EPA OFFICE OF PESTICIDE PROGRAMS, ENVIRONMENTAL FATE AND EFFECTS DIVISION* |
PHONE: (703) 305-7356